

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

BILL OF INFORMATION FOR WIRE FRAUD

| | | |
|---------------------------|---|--------------------------|
| UNITED STATES OF AMERICA | * | CRIMINAL NO. |
| v. | * | SECTION: |
| SHANNON HARP | * | VIOLATION: 18 U.S.C. § 2 |
| a/k/a "Shannon L. Taylor" | | 18 U.S.C. § 1343 |
| "Shannon L. Harp" | * | |
| "Shannon L. Harp, Jr." | * | |
| "Shannon L. Harpe" | * | |
| | * | |

The United States Attorney charges that:

COUNT 1

AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **SHANNON HARP**, a/k/a "**Shannon L. Taylor**", "**Shannon L. Harp**", "**Shannon L. Harp, Jr.**" and "**Shannon L. Harpe**" was employed as an assistant controller at either the Marriott Hotel on Canal Street, the J. W. Marriott Hotel on Canal Street or the Marriott on Convention Center

Boulevard. She was promoted to Director of Finance when she moved to the Marriott Hotel Convention Center.

2. Marriott, in order to provide small denominations of currency for bars, restaurants, and shops in the hotel had in place a system by which small bills were delivered to the hotels from Marriott accounts at the Whitney National Bank.
3. In order to have an armored car deliver the currency to the Marriott property, a Marriott document called a "change order" was executed by Marriott financial personnel and delivered to the financial institution.
4. When the cash was delivered, a Marriott employee would sign for the cash and the money would be disbursed to bars, shops and restaurants at the Marriott property to make change for customers.
5. At a later time, larger bills accumulated after making change would be collected and deposited back into Marriott accounts.
6. Marriott had in place an interstate computer system titled "Virtual Private Network."
7. Accounting entries concerning the deposits back into the Marriott accounts would be made on Marriott computers in New Orleans, Louisiana and transmitted to the Marriott control computer in Frederick, Maryland.

A. THE SCHEME TO DEFRAUD

1. Beginning at a time unknown, but from in or around May 2003 to in or around July 2006, in the Eastern District of Louisiana, the defendant **SHANNON HARP**, knowingly devised and intended to devise a scheme and artifice to defraud Marriott and obtain money and property by means of false and fraudulent pretenses, representations and promises, in connection with defendant's **SHANNON HARP** issuing fraudulent change orders for currency purportedly to make change at Marriott Hotel properties, bars, restaurants, and shops, but in truth and in fact defendant, **SHANNON HARP** would convert Marriott's money to her own personal use.
2. It was further a part of the scheme that defendant, **SHANNON HARP** would make or cause to be made fraudulent change orders for large dollar amounts and large denominations. When the money would arrive from the financial institution, defendant, **SHANNON HARP** would physically remove the money from the Marriott property and convert it to her own personal use. Defendant, **SHANNON HARP** took in excess of \$2,000,000.00 from Marriott using this scheme and artifice.

3. It was further a part of the scheme and artifice to defraud that defendant, **SHANNON HARP**, in order to conceal her theft, would enter false and fraudulent financial information into the Marriott Virtual Private Network (VPN), and cause the false data to be transmitted through the interstate wire system to Frederick, Maryland, where the main accounting office for Marriott was located.

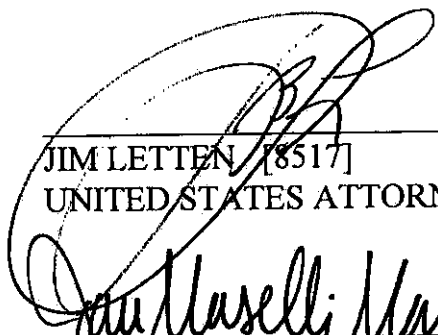
B. THE EXECUTION OF THE SCHEME AND WIRE TRANSMISSION


From in or around May 2003 to in or around July 2006, and specifically on the date listed below in the Eastern District of Louisiana, defendant, **SHANNON HARP**, for the purpose of executing and attempting to execute the scheme and artifice to defraud and for obtaining money, knowingly transmitted and caused to be transmitted in interstate commerce from Louisiana to Maryland by means of a wire communication, certain signs, signals, and sounds, that is, electronic data into Marriott's VPN which indicated that monies had been deposited into Marriott accounts or had been spent on legitimate Marriott business, when in truth and in fact, as defendant, **SHANNON HARP** well knew, the monies had been taken by her and converted to her personal

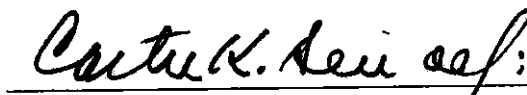
use, and the fraudulent wire transactions were necessary to hide the scheme from Marriott, as listed below:

| COUNT | DATE | FROM | TO | USE OF WIRE |
|-------|-------------------|------------------------|---------------------|---|
| 1 | February 24, 2006 | New Orleans, Louisiana | Frederick, Maryland | False entry to cover scheme to defraud. |

All in violation of Title 18, United States Code, Sections 1343 and 2.


JIM LETTEN [8517]
UNITED STATES ATTORNEY


JAN MASELLI MANN [9020]
First Assistant United States Attorney


CARTER K. D. GUICE, Jr. [1671]
Assistant United States Attorney

New Orleans, Louisiana
July 10, 2009